



# The Bridge: Interdisciplinary Perspectives on Legal & Social Policy

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Volume 6

Issue 2 *Re-Imagining "We the People" Part Two: Transcripts from the AAJ Education's Civil Rights and Police Misconduct Litigation Seminar*

Article 2

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2021

## A Tale of Two Americas

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### Recommended Citation

Harris, Laisha (2021) "A Tale of Two Americas," *The Bridge: Interdisciplinary Perspectives on Legal & Social Policy*. Vol. 6 : Iss. 2 , Article 2.

Available at: <https://digitalscholarship.tsu.edu/thebridge/vol6/iss2/2>

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## **A Tale of Two Americas**

Written By: Laisha Harris

To appreciate the depth of the conversation in this journal, we must look into American History to gather context. As a person of color, I typically see the ironic juxtaposition in America – what is displayed in the media versus what is experienced in the communities of color. Police misconduct and abuse of power gained national traction during Trump’s presidency, displaying a reality of injustice that most would deny as a core principle embedded in America. In the summer of 2020, everyone paused due to a global pandemic, and the world watched and responded to the murder of George Floyd. The alarm on the concept of police brutality rang a different tune to communities of color, who have been watching and responding to the murders of their loved ones for nearly 400 years. Whether or not you feel safe as an American in this nation may depend on which side of the railroad tracks—or the freeway—you live on. However, whether you survive an encounter with the police may depend on the immutable color of your skin.

### **History of Policing**

The idea of “policing” in ‘America’ came into fruition around 1630.<sup>1</sup> It is important to keep in mind that in 1619, it was perfectly normal and legal to capture, enslave and inflict violence on black and brown men, women, and children. Groups – often families of enslaved Africans – lived in small houses on large plantations owned by southern property owners. To strip the enslaved Africans of their strength, dignity, and culture, we were beaten, raped, tortured, and forced into submission *if* we survived the abuse. Whips, malnutrition, and violence were used on plantations in order for the Master or “overseer” to get the slaves to do what they were told. No matter how the history books may frame it, slavery was a very brutal and unpleasant experience for black people. The only policing they experienced was at the hands of their captors.

In early America, there were precautionary measures taken against criminals, violence, and disruption in the community. ‘Watchmen’ were compensated to protect private property by private citizens as society became more urban and industrialized.<sup>2</sup> However, at this time, free society did not consist of black people. In the North, businesses and commercial centers were being formed. As industries grew, so did the wave of immigrants from Eastern Europe.<sup>3</sup> In the South, ‘Slave Patrol’ were militias formed by the state, county, or the plantation owners themselves.<sup>4</sup> If a slave were to ‘run away’ or ‘escape,’ they would be labeled a fugitive, guilty of breaking the law and deserving of punishment. Throughout the South, there was a steady trend of resistance amongst the growing slave population. As rational as their actions were, slaves were

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<sup>1</sup> Potter, Dr. Gary. "The History of Policing in the United States. ECU Online. November 6, 2014, 2.

<sup>2</sup> *Id.*

<sup>3</sup> Remini, Robert V. *A Short History of the United States*. Harper Perennial, 2008, 131.

<sup>4</sup> Potter, Dr. Gary, 3.

the property of their owners and thus had no individual rights or privileges.<sup>5</sup> In 1793, Congress enacted the first Fugitive Slave Act which authorized local governments to capture and return runaway enslaved people.<sup>6</sup>

The first police department was established in New York in 1844, and other major cities followed suit. Soon thereafter, cities across the country began organizing their own police departments: New Orleans and Cincinnati in 1852, Boston and Philadelphia in 1854, Chicago and Milwaukee in 1855, using a quasi-military command structure.<sup>7</sup> As a result, in 1865, during the Reconstruction Era, the United States ratified the Thirteenth Amendment to the Constitution, prohibiting slavery or involuntary servitude “except as punishment for a crime.”<sup>8</sup> Southern states struggled with the idea of living amongst newly freed slaves, as they feared we would retaliate against them with violence, but there was—and still is—a loophole in the newly enacted legislation. In 1865 and 1866, southern states along the Bible Belt began to enact The Black Codes and Jim Crow Laws.<sup>9</sup>

### **Slavery by Another Name**

Under the Black Codes, changing employers without permission, riding on freight cars without a ticket, vagrancy, and loitering were just a few examples of laws written specifically to terrorize and subdue blacks.<sup>10</sup> Douglas Blackmon describes the southern judicial system as having been “reconfigured to make one of its primary purposes the coercion of blacks to comply with the social customs and labor demands of whites.”<sup>11</sup> Some plantation owners attempted to coerce their former slaves, often uneducated and illiterate, into signing “lifetime contracts” to work on their farms. In South Carolina in 1865, when four freedmen refused such agreements, two were killed and a third, a woman, was tortured.<sup>12</sup> A Mississippi statute in 1865 required African American workers to enter into labor contracts with white farmers or face arrest.<sup>13</sup> While there was an abundance of newly freed yet poor and uneducated slaves, Southern states began to form convict camps and private prisons so that convict labor could be sold to budding corporations in need of workers that would not demand as much pay as migrant Europeans in the Northern states. Through the loophole in the Thirteenth Amendment, “the men who controlled squads of black laborers ... to the highest bidder[s]” were no longer the slave owners, but the sheriffs.<sup>14</sup>

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<sup>5</sup> Remini, Robert V., 133.

<sup>6</sup> 1 Stat. 302, 2 Cong. Ch. 7.

<sup>7</sup> Potter, Dr. Gary, 2.

<sup>8</sup> U.S. Const. art. IV, amend. XIII § 1

<sup>9</sup> Remini, Robert V., 157.

<sup>10</sup> 2011 Bill Text MS H.C.R. 2.

<sup>11</sup> Blackmon, Douglas. *Slavery by Another Name: The Re-Enslavement of Black Americans From The Civil War To World War II*. Anchor Books, 2008, 7.

<sup>12</sup> *Id.* at 27, footnote 35.

<sup>13</sup> *Id.* at 53.

<sup>14</sup> *Id.* at 64.

A few years later in 1868, the Fourteenth Amendment granted all citizens, regardless of race or previous status of servitude, equal protection of the laws.<sup>15</sup> Citizens had been granted equal protection of the laws – however, people of color were not protected against violence in the “free community” or for being placed back into a slave condition for frivolously labeled criminal activity. From 1880-1890, 30,659 people were imprisoned in state and federal prisons across the United States.<sup>16</sup>

### **National Disregard Towards Racially Motivated Violence**

Between 1877 and 1950, the Equal Justice Initiative reported nearly 4,400 lynchings across the United States.<sup>17</sup> These are the numbers of reported lynchings during that time. Mobs of white men, women and children would gather to watch, embrace, and celebrate the killing of someone, usually by hanging, for an allegation that was never investigated by police or litigated in a court of law. Fleeing the violence and racial tension in the South, many black families migrated to growing cities like Detroit, Chicago, Boston, Philadelphia, and New York City.<sup>18</sup>

In 1905, Pennsylvania established the prototype of a state police department, which was soon followed by other states. The Federal Bureau of Investigation was founded in 1908, and an increasing number of local cities and governments began creating their own police departments to prevent crime and disorder in communities overwhelmed by racial and economic differences. While an honorable intention, state and local municipalities failed to intervene when crime and disorder involved black communities.

After the 1915 release of “The Birth of a Nation,” the Ku Klux Klan peaked from 1.5 million to 4 million, a membership mostly kept anonymous by the wearing of white hoods in public.<sup>19</sup> In Oklahoma’s Greenwood District in 1921, hundreds of black-owned businesses and homes were destroyed by an angry white mob. The massacre, which left hundreds dead, thousands homeless and over \$1.5 million in property damage began after a 19-year-old shoe-shiner was accused of assaulting a 17-year-old female.<sup>20</sup> In 1923, a black community in Florida known as Rosewood was destroyed by an angry mob of white citizens responding to an assault of a 22-year-old white woman.<sup>21</sup> The stories of these communities have been mostly excluded as moments in American history and the police were noticeably absent.

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<sup>15</sup> U.S. Const. amend. XIV § 1.

<sup>16</sup> U.S. Department of the Interior, Bureau of Census; Washington, D.C. (1880) Report on the Defective, Dependent and Delinquent Classes of the Population of the United States, As Returned at the Tenth Census 1880. 1888, 485.

<sup>17</sup> *Lynching in America: Confronting the Legacy of Racial Terror*. Equal Justice Initiative. Third Edition, 2017.

<sup>18</sup> Hughes, Langston. “One-Way Ticket.” *The collected poems of Langston Hughes*. Random House. 1994.

<sup>19</sup> *Ku Klux Klan: A History of Racism and Violence*. The Southern Poverty Law Center. The Klanwatch Project. Montgomery, Alabama. Sixth Edition, 2011, 23.

<sup>20</sup> *Alexander v. Oklahoma*, No. 03-C-133-E, 2004 U.S. Dist. LEXIS 5131 (N.D. Okla. 2004).

<sup>21</sup> 1994 Bill Text FL H.B. 591.

During the Great Depression, the murder rate in the United States peaked to 9.7 murders per 100,000 population.<sup>22</sup> In 1930, the Federal Bureau of Prisons was established in order to provide humane care for federal inmates and ensure consistent and centralized administration of operations.<sup>23</sup> In 1935, the FBI National Academy was created to provide training to law enforcement officers, eliminate state corruption, and introduce principles of police management. As police power is delegated to local municipalities and states, there was no set criteria for police training which caused a nationwide lack in uniformity.<sup>24</sup> To this day, the role and execution of police power is reserved for the States or local municipalities therein.<sup>25</sup> There is an unchecked level of autonomy that lives within the blue walls of the police departments throughout the country. While police have been relatively effective in maintaining a steady level of crime, there was tremendous oversight when it came to protecting the lives and communities where black and brown people lived.

### **One Step Forward, Two Steps Back**

With the numbers of other reported crimes on the rise, black communities were still plagued by Jim Crow laws, lynching and racially motivated violence, completely unaddressed by state and local police. It's as if as a nation, we would take one step forward, but in our local communities, take two steps back.

On May 17, 1954, the Supreme Court decided in *Brown v. Board of Education*, that segregation in public education was a violation of the Fourteenth Amendment.<sup>26</sup> In 1957, nine black students arrived at Central High School in Little Rock, Arkansas seeking an education. Instead, they were met with a violent mob and refused entry by Arkansas National Guard, sent by their Governor.<sup>27</sup>

Claudette Colvin, age 15, inspired Rosa Parks and other activists in Montgomery, Alabama to successfully boycott public busses that required black patrons to give up their seats to a white patron.<sup>28</sup> The boycott lasted 382 days. On November 14, 1956, the Supreme Court held that segregated seating on public transportation was unconstitutional.<sup>29</sup>

In 1955, 14-year-old Emmitt Till was kidnapped and brutally murdered for allegedly flirting with a white woman.<sup>30</sup> In 1963, the Ku Klux Klan planted a bomb in a Birmingham church, killing

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<sup>22</sup> Uniform Crime Reports, 1933–1998, Federal Bureau of Investigation.

<sup>23</sup> United States Department of Justice. Federal Bureau of Prisons. "About the Federal Bureau of Prisons." [www.bop.gov](http://www.bop.gov).

<sup>24</sup> "Local Police Departments Policies and Procedures, 2016." United States Department of Justice. Office of Justice Programs. Bureau of Justice Statistics. August 2020.

<sup>25</sup> U.S. Const. amend. X. (1992).

<sup>26</sup> *Brown v. Board of Edu of Topeka*, 347 US 483 (1954).

<sup>27</sup> *Teague v. Ark. Bd. of Educ.*, 873 F. Supp. 2d 1055, 1063 (W.D. Ark. 2012) (see footnote 21).

<sup>28</sup> Olsson, Göran Hugo. *The Black Power Mixtape: 1967-1975*. Haymarket Books. 2013, 33.

<sup>29</sup> *Gayle v. Browder*, 352 US 903 (1956).

<sup>30</sup> Federal Bureau of Investigations. FBI Records: The Vault. Civil Rights. Freedom of Information Act.

four black girls, ages 11 and 14.<sup>31</sup> During this time, black protestors and advocates across the country engaged in mass, nonviolent protests, bringing light to the inequities and violence that people of color continued to endure.

Across the South, people of color engaged in nonviolent sit-ins in order to get private and public establishments to change their racially biased policies. Civil rights activists, their families and children, were attacked with dog and firehoses by police, while their homes and churches were bombed by the Klan.<sup>32</sup> Notably, Martin Luther King, Jr. led provocative conversations around race, forcing America to reconcile with the laws that allowed racial discrimination and segregation.

In July of 1964, legislators recognized the impact losing the black dollar would have on the economy, and Congress passed Title II of the Civil Rights Act of 1964, prohibiting racial discrimination in public and private establishments.<sup>33</sup> In late 1965 in Los Angeles, Marquette Frye, 21-year-old black man, was violently apprehended by police, and upset bystanders soon transformed into the six-day Watts Riot, protesting the unnecessary brutality by police.

In 1966, Bobby Seale and Huey Newton founded the Black Panther Party for Self-Defense in Oakland, California. This revolutionary organization embraced ideologies of black nationalism and armed self-defense as protection against police brutality.<sup>34</sup> The BPP had an honorable ten-point program, demanding freedom, full employment, decent housing, adequate education, resources, and most importantly, an end to the police brutality and murder of black people. The BPP also initiated the free breakfast program which was later adopted by public schools.<sup>35</sup> There was momentum during the Civil Rights Movement that inspired black families that change was on the horizon. The BPP was a rare example of black strength, community, and to many, a symbol of hope. This hope, alongside Martin's dream, would soon be met with a different reality.

## **COINTELPRO**

In 1956, the FBI began a counterintelligence program (COINTELPRO) to survey, infiltrate and disrupt American political organizations.<sup>36</sup> Although the program was later criticized, it operated under the authority of the government until 1971. This program was established to spy on, disrupt the activities and progress of various social/domestic groups in America. FBI Director J. Edgar Hoover declared the BPP as the greatest threat to American security, subliminally

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<sup>31</sup> *Ku Klux Klan: A History of Racism and Violence*. The Southern Poverty Law Center. The Klanwatch Project. Montgomery, Alabama. Sixth Edition, 2011, 29.

<sup>32</sup> *Id.* at 25-26.

<sup>33</sup> 42 USC § 2000(a).

<sup>34</sup> Olsson, Göran Hugo, 79-83.

<sup>35</sup> *Id.* at 84.

<sup>36</sup> Department of Justice. Federal Bureau of Investigations. Series: Classification 157 (Civil Unrest) Case Files, 1957-1978 Record Group 65: Records of the Federal Bureau of Investigations, 1896-2008.

encouraging the violence and destruction of their offices across the country, while also inciting state officials to halt their progress at any cost.<sup>37</sup>

Arrests and interactions with civil rights leaders became more about silencing their political views and less about committing true criminal acts. Huey Newton was arrested and convicted of shooting a police officer, but he was unconscious at the time of the murder.<sup>38</sup> Although an international defense campaign procured his release, Newton was still labelled a radical threat. The FBI used this program to wire-tap, infiltrate, and ultimately dismantle what they identified as “Black Extremist” groups.<sup>39</sup> Agents were assigned an organization, gathered intel, used confidential informants, and reported their findings to their supervisors. The U.S. Senate acknowledged COINTELPRO as “a sophisticated vigilante operation aimed at . . . preventing the exercise of First Amendment rights to speech” and association.

In 1963, civil rights activist and WWII veteran Medgar Evers was shot in the head by a sniper in Jackson, Mississippi.<sup>40</sup> In 1965, Malcolm X was assassinated by “rival” members of the Nation of Islam. In 2021, the two men were convicted then later exonerated.<sup>41</sup> In 1967, Wharlest Jackson, recently appointed to a position previously only held for whites, died after a bomb in his car exploded. In 1968, Martin Luther King Jr. was assassinated.<sup>42</sup> In 1969, Black Panther Party Leader in Chicago, Fred Hampton, was assassinated during a joint raid on his home by State’s Attorney’s Office, the Chicago Police Department, and the FBI.<sup>43</sup> While Huey Newton was not assassinated until 1989, the momentum from the Civil Rights movement slowly transitioned to immobility.

When police are present in black communities, they are violent. When police are absent, our homes and churches are torched. When we arm ourselves to protect ourselves from the injustice, our organizations are infiltrated and our leaders are assassinated, with the blame either misplaced or uninvestigated. The black community began to stitch the blanket of complacency as we became intertwined in the web of mass incarceration.

### **War on Dr(U)g(S)**

In early 1971, former President Nixon initiated a war on drugs as an attempt to curb the illegal drug trade booming in the United States. After the Vietnam War, there was a tremendous increase in the production, sale and distribution of opioids and cocaine, which can be made into

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<sup>37</sup> Olsson, Göran Hugo, 94-98.

<sup>38</sup> *Id.* at 99.

<sup>39</sup> Department of Justice. Federal Bureau of Investigations. Series: Classification 157 (Civil Unrest) Case Files, 1957-1978 Record Group 65: Records of the Federal Bureau of Investigations, 1896-2008.

<sup>40</sup> *Letters from Black America: Intimate Portraits of the African American Experience.* Edited by Pamela Newkirk. Beacon Press. 2009, 43.

<sup>41</sup> “2 men convicted of killing civil rights leader Malcolm X are exonerated in court.” By Vanessa Romo. November 18, 2021. <https://www.npr.org/2021/11/17/1056649430/malcolm-x-aziz-islam-exonerate>.

<sup>42</sup> Remini, Robert V., 278.

<sup>43</sup> Federal Bureau of Investigations. FBI Records: The Vault. Civil Rights. Freedom of Information Act.

heroin and crack. The Controlled Substance Act of 1970 established federal drug law policies and mandatory minimums for drug related offenses.<sup>44</sup> The legislation on the war on drugs emphasized drugs as the number one problem in America. In a Frontline interview, author of “The New Jim Crow” Michelle Alexander points out that in 1982, drug crime was on the decline. However, President Reagan wanted “to make good on campaign promises to get tough on a group of folks who had already been defined ...” as criminals in the media, and that group was black and brown.<sup>45</sup>

Local states and cities used an opportunity to strengthen their police departments through federal assistance under the Anti-Drug Abuse Act of 1988. This funding provided for state and local drug enforcement agencies, and programs for which the primary goal is to strengthen urban law enforcement and prosecution.<sup>46</sup> The more reports of criminal offenders and drug abusers, the more a department may qualify for federal funding. The average population under the United States Correction System in 1980 was 319,598.<sup>47</sup> By 1980’s, drug related arrests peaked at 539 per 100,000 population.<sup>48</sup> Today, black males are six times more likely to serve time in prison than white males.<sup>49</sup>

The Violent Crime Control and Law Enforcement Act of 1994 provided \$9.7 billion in funding for prisons and established the “Three Strike Rule.” After a third conviction for a violent felony or drug related offense, a mandatory life in prison without the possibility of parole is imposed. By 1997, there were approximately 1.16 million persons incarcerated in the United States.<sup>50</sup> Black males between 25-44 are 21% more likely to have been incarcerated, whereas white males hover around 1.8%.

### **382 Years Later . . .**

As of 2001, there are nearly 4,455 prison institutions in the United States: 3,163 on a local level, 1,190 state and 102 federal facilities. In 2000, the prison population rate was near 683 per 100,000 with 1.9 million incarcerated. Barack Obama, the nation’s first black President, was

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<sup>44</sup> 21 USC Ch. 13, § 801 et. req.

<sup>45</sup> Childress, Sarah. Michelle Alexander: “A System of Racial and Social Control.” 29 Apr. 2014.

<https://www.pbs.org/wgbh/frontline/article/michelle-alexander-a-system-of-racial-and-social-control/>

<sup>46</sup> United States General Accounting Office. April 1993. “War on Drugs: Federal Assistance to State and Local Drug Enforcement.” Henry R. Wray. Report to Chairman, Information, Justice, Transportation & Agriculture Subcommittee, Committee on Government Operations, House of Representatives.

<sup>47</sup> United States Department of Justice. Office of Justice Programs. Bureau of Justice Statistics. December 1986.

“Historical Corrections Statistics in the United States, 1850 – 1984.” Margaret Werner Cahalan. NCJ—102529.

<sup>48</sup> Uniform Crime Reports, 1933–1998, Federal Bureau of Investigation.

<sup>49</sup> United States Department of Justice. Office of Justice Programs. Bureau of Justice Statistics. December 2009.

“Prisoners in 2008.” Matthew Cooper, Heather C. West, William J. Sabol. NCJ—228417. Revised June 30, 2010.

<sup>50</sup> United States Department of Justice. Office of Justice Programs. Bureau of Justice Statistics. August 2003. Special Report, “Prevalence on Imprisonment in the United States Population, 1974-2001. Thomas P. Bonzcar. NCJ—197976.

elected in 2008. This is yet another indication to people of color that change is upon us and the stride towards racial equity is still ongoing.

During that same year, the prison population peaked at 2,307,504 with 38% of sentenced prisoners being black.<sup>51</sup> Blacks make up 13% of the population, and yet are arrested in the same numbers, and often higher, than those of their white or Hispanic counterparts. It was also during Obama's Presidency that the spread of cell phone technology allowed us to witness violence by the police in a way that was uncomfortably copious. Too many times have I seen a viral recording of a death and it hit way too close to home.

The first death that disrupted my spirit was Trayvon Martin on February 26, 2012. Trayvon was killed by someone monitoring the neighborhood. Before the altercation, Zimmerman called the police to notify them of someone who appeared to be on drugs and "up to no good."<sup>52</sup> Dispatchers told Zimmerman not to pursue Martin, but he did. Trayvon was my brother's age. Zimmerman was found not guilty. A few months later in July, Chavis Carter, in Jonesboro, Arkansas, had his hands cuffed behind his back, and somehow shot himself in the head. This shooting, ruled a suicide, happened three hours from where I lived. In January of 2013, the body of 17-year-old Kendrick Johnson was found dead, rolled inside of a gym mat in a high school in Valdosta, Georgia. I am writing this in 2021 – no one has been arrested, investigated, or convicted of Kendrick Johnson's death.

As time continues to move forward, more and more names are added to the list of unarmed people of color who have died at the hands of the police. In July of 2014, Eric Garner was killed by the NYPD, accused of illegally selling cigarettes on the streets.<sup>53</sup> In August of 2014, protests erupted in Ferguson, Missouri as a response to the shooting of 18-year-old Mike Brown, who was shot six times in his back with his hands raised. There was no call for medical attention, while his body laid in the street for four hours before being taken to the morgue.<sup>54</sup> In November 2014, 12-year-old Tamir Rice was immediately fired upon by police while carrying a replica toy-gun in a park.<sup>55</sup> None of the officers involved in these shootings were convicted.

At this time, we begin to see the trend of #BlackLivesMatter. Across the country, communities of color have come together to collectively speak on and challenge the institutional and systemic racism that allows so many of us to perish, with little to no consequences for the offenders. While the First Amendment provides for all people to engage in nonviolent protest, the Eleventh Amendment establishes sovereign immunity, protecting the State from civil liability.<sup>56</sup> You

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<sup>51</sup> *Id.*

<sup>52</sup> Tiffini Theisen, George Zimmerman was found not guilty in Trayvon Martin's killing 8 years ago this week, Orlando Sentinel, July 14, 2021. <https://www.orlandosentinel.com/news/seminole-county/os-ne-george-zimmerman-found-not-guilt-in-trayvon-martins-killing-8-years-ago-20210714-cjfsnntajra7xoirc36cju7rm-story.html>

<sup>53</sup> *Matter of Carr v. De Blasio*, 197 N.Y.S3d App. Div. 124, 127 (July 2021).

<sup>54</sup> *Brown v. City of Ferguson*, No. 4:15 CV00831 ERW, 2015 U.S. Dist. LEXIS 92444 (E.D. Mo. 2015).

<sup>55</sup> *Winston v. City of Cleveland*, No. 1:14 CV2670, 2016 U.S. Dist. LEXIS 12248 (N.D. Ohio 2016).

<sup>56</sup> *Sossamon v. Texas*, 131 S. Ct. 1651, 1657-1658 (2011).

cannot sue the State for a violation of the Constitution as the State cannot authorize unconstitutional conduct. Further, the Fourth Amendment has been interpreted to permit police to use “objectively reasonable” force in the course of making an arrest or during an investigatory stop.<sup>57</sup> As was determined with the shooting of Mike Brown, the officer’s “reasonable fear” in light of the circumstances justified his use of force and there was no indictment. We did, however, see a different outcome with the death of George Floyd.

*Eight minutes.* It took the country watching a man have an active police officer’s knee placed upon his neck for eight minutes, while three officers watched and bystanders recorded, before there was an eruption of outrage. While the context may have just become apparent with the visual murder of George Floyd, encompassed with the deaths of Ahmaud Arbery and Brionna Taylor, this has been an ongoing problem for the communities of color for over four-hundred years. The overwhelming abundance of wrongful death that we’ve consumed, in the past 50 years alone, has been enough to truly place our community between a rock and a hard place.

*Four hundred years.* There is so much love, beauty, and joy in the spirits of black people, despite the constant horrors that we have faced. Magnificent things come from people of color when they are given a chance. Consider: inventors Benjamin Banneker<sup>58</sup>, Lewis Latimer<sup>59</sup>, and Garrett Morgan<sup>60</sup>; millionaire Madam CJ Walker<sup>61</sup> or billionaire Oprah Winfrey<sup>62</sup>; or our first black President, Barack Obama<sup>63</sup>, and first black, female Vice-President Kamala Harris. Our history is filled with success that came from an enslaved beginning in this country, over four hundred years ago. I think the reason why we are still having this conversation about race is because as a country, it is something that we have never addressed. History will continue to repeat itself until a lesson is learned. Something has to change. Change can start by having the conversation—what needs to follow is accountability.

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<sup>57</sup> *De Contreras v. City of Rialto*, 894 F. Supp. 2d 1238, 1243 (C.D. Cal. 2012).

<sup>58</sup> Bracks, Lean’tin. *African American Almanac*. Visible Ink Press. 2012, 395.

<sup>59</sup> *Id.* at 406.

<sup>60</sup> *Id.* at 408-409.

<sup>61</sup> *Id.* at 178.

<sup>62</sup> *Id.* at 194.

<sup>63</sup> *Id.* at 62.